

1 RYAN K. YAGURA (S.B. #197619)  
ryagura@omm.com  
2 NICHOLAS J. WHILT (S.B. #247738)  
nwhilt@omm.com  
3 XIN-YI ZHOU (S.B. #251969)  
vzhou@omm.com  
4 O'MELVENY & MYERS LLP  
5 400 South Hope Street, Suite 1900  
Los Angeles, CA 90071  
6 Telephone: 213-430-6000  
Facsimile: 213-430-6407

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8 *Attorneys for Defendants The Walt Disney*  
*Company, Disney Media and Entertainment*  
*Distribution LLC, Disney DTC LLC, Disney*  
9 *Streaming Services LLC, Disney Entertainment &*  
10 *Sports LLC, Disney Platform Distribution, Inc.,*  
*BAMTech LLC, Hulu, LLC, and ESPN, Inc.*

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **WESTERN DIVISION AT LOS ANGELES**

14 INTERDIGITAL INC.,  
15 INTERDIGITAL VC HOLDINGS,  
16 INC., INTERDIGITAL MADISON  
17 PATENT HOLDINGS, SAS, AND  
18 INTERDIGITAL CE PATENT  
19 HOLDINGS, SAS,

20 Plaintiffs and  
21 Counterclaim-  
22 Defendants,

23 v.

24 THE WALT DISNEY COMPANY,  
25 DISNEY MEDIA AND  
26 ENTERTAINMENT  
27 DISTRIBUTION LLC, DISNEY DTC  
28 LLC, DISNEY STREAMING  
SERVICES LLC, DISNEY  
ENTERTAINMENT & SPORTS  
LLC, DISNEY PLATFORM  
DISTRIBUTION, INC., BAMTECH,  
LLC, HULU, LLC, AND ESPN, INC.,

Defendants and  
Counterclaim-  
Plaintiffs.

Case No. 2:25-cv-895-WLH-BFM

**JOINT STIPULATION REGARDING  
THE SCOPE OF ALLEGATIONS IN  
INTERDIGITAL'S FEBRUARY 2,  
2025 COMPLAINT**

Judge: Hon. Wesley L. Hsu  
Magistrate: Hon. Brianna Fuller Mircheff

Defendants The Walt Disney Company, Disney Media and Entertainment Distribution LLC, Disney DTC LLC, Disney Streaming Services LLC, Disney Entertainment & Sports LLC, Disney Platform Distribution, Inc., BAMTech, LLC, Hulu, LLC, and ESPN, Inc. (collectively, “Defendants”) and Plaintiffs InterDigital Inc., InterDigital VC Holdings, Inc., InterDigital Madison Patent Holdings, SAS, and InterDigital CE Patent Holdings, SAS (collectively, “InterDigital” or “Plaintiffs”), by and through their undersigned counsel of record, hereby agree and stipulate as follows:

1. On February 2, 2025, InterDigital filed its Complaint for patent infringement against Defendants. Dkt. 1.

2. On April 18, 2025, the parties met and conferred to discuss the scope of the allegations in InterDigital’s Complaint, specifically regarding any claims for inducement of infringement, contributory infringement, or willful infringement against Defendants.

3. On May 5, 2025, the parties agreed on the language for the below stipulation.

### STIPULATION

Accordingly, the Parties, by and through their respective attorneys of record, hereby stipulate that:

1. InterDigital’s Complaint filed on Feb. 2, 2025 (Dkt. 1) (the “Original Complaint”) does not include claims of inducement of infringement, contributory infringement, or willful infringement.

2. InterDigital is withdrawing Paragraph B in the Original Complaint’s Prayer for Relief (“A judgment and order finding that Defendants’ infringement has been willful”).

3. This stipulation in no way alters InterDigital’s allegations related to any claim set forth in Counts I through V of the Original Complaint. Nor does it relate to or alter any relief requested in the Original Complaint’s Prayer for Relief other than

1 Paragraph B. InterDigital expressly reserves its rights to amend the Complaint in  
2 accordance with the local rules and the Federal Rules of Civil Procedure.

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1 DATED: June 16, 2025

2 Respectfully submitted,

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4 By: /s/ Richard Kamprath

By: /s/ Nicholas J. Whilt

Nicholas J. Whilt

5  
6 Alan P. Block (CA Bar No. 143783)  
7 ablock@mckoolsmith.com  
8 **MCKOOL SMITH, P.C.**  
9 300 South Grand Avenue, Ste. 2900  
10 Los Angeles, CA 90071  
11 Telephone: (213) 694-1200

RYAN K. YAGURA  
NICHOLAS J. WHILT  
XIN-YI ZHOU  
O'MELVENY & MYERS LLP

12 Richard Kamprath (*admitted pro hac*  
13 *vice*)  
14 rkamprath@mckoolsmith.com  
15 Alexandra Easley (*admitted pro hac*  
16 *vice*)  
17 aeasley@mckoolsmith.com  
18 R. Arden Seavers (*admitted pro hac*  
19 *vice*)  
20 aseavers@mckoolsmith.com  
21 **MCKOOL SMITH, P.C.**  
22 300 Crescent Court, Suite 1200  
23 Dallas, TX 75201  
24 Telephone: (214) 978-4000

*Attorneys for Defendants The Walt Disney Company, Disney Media and Entertainment Distribution LLC, Disney DTC LLC, Disney Streaming Services LLC, Disney Entertainment & Sports LLC, Disney Platform Distribution, Inc., BAMTech LLC, Hulu, LLC, and ESPN, Inc.*

25 Joshua W. Budwin (*admitted pro*  
26 *hac vice*)  
27 jbudwin@mckoolsmith.com  
28 **MCKOOL SMITH, P.C.**  
303 Colorado Street, Suite 2100  
Austin, TX 78701  
Telephone: (512) 692-8700

Kevin Burgess (*admitted pro hac*  
*vice*)  
kburgess@mckoolsmith.com  
**MCKOOL SMITH, P.C.**  
104 East Houston Street, Ste. 300  
Marshall, TX 75670  
Telephone: (903) 923-9000

Hannah Mirzoeff (*admitted pro hac*  
*vice*)  
hmirzoeff@mckoolsmith.com  
**MCKOOL SMITH, P.C.**  
1301 Avenue of the Americas, 32<sup>nd</sup>  
Floor  
New York, NY 10019  
Telephone: (212) 402-9400

1 Nancy Olson (SBN 260303)  
2 nolson@olsonstein.com  
3 David Stein (SBN 198256)  
4 dstein@olsonstein.com  
5 **OLSON STEIN LLP**  
6 240 Nice Lane, #301  
7 Newport Beach, CA 92663  
8 Telephone: (310) 916-7433

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*Attorneys for Plaintiffs InterDigital,  
Inc., InterDigital VC Holdings, Inc.,  
InterDigital Madison Patent  
Holdings, SAS, and InterDigital CE  
Patent Holdings, SAS*

**ATTESTATION**

Pursuant to Local Rule 5-4.3.4(a)(2), the filer attests that the other signatories listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

By: /s/ Nicholas J. Whilt  
Nicholas J. Whilt